

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NATHANIEL J. BROUGHTY,

Plaintiff,

v.

CHRISTOPHER E. BOUZY,

Defendant.

Case No. 2:22-cv-6458-SDW-AME

**SECOND CERTIFICATION OF COUNSEL**

I, William P. Reiley, being of full age, hereby certify as follows:

I am an attorney at law in the State of New Jersey and an Associate of Ballard Spahr LLP, attorneys for defendant, Christopher E. Bouzy (“Bouzy”). I make this certification based on personal knowledge and in support of Bouzy’s motion to dismiss Plaintiff’s First Amended Complaint (the “FAC”).

I submit this Certification to place before the Court copies of certain tweets referenced in Plaintiff’s First Amended Complaint and the Memorandum of Law in Support of Defendant’s Motion to Dismiss Plaintiff’s First Amended Complaint (“Bouzy’s MTD Memorandum”). My co-counsel and I worked with a litigation paralegal at our firm to capture true and correct copies of these tweets where they were originally published on the Internet.

In my previous Certification submitted with Defendant's Motion to Dismiss Plaintiff's initial Complaint, I placed before the Court, as 22 numbered exhibits, the tweets that Plaintiff challenged in that initial Complaint, as well as other related materials referenced in the Complaint and those tweets. In this Second Certification, I place before the Court Exhibits A-G, which are a series of tweets that Plaintiff challenges for the first time in his First Amended Complaint.

Although the First Amended Complaint challenges 10 tweets not included in the initial Complaint, I have also attached and listed below the other tweets that are part of the same threads to present the challenged statements in their full context. For the Court's convenience, we have highlighted in the paragraphs that follow the specific tweets challenged in the First Amended Complaint.

1. Attached as **Exhibit A** is a true and accurate copy of 2 related tweets posted by Bouzy on October 14, 2022, which are available at <https://twitter.com/cbouzy/status/1581089754887569409> (FAC ¶ 77), and <https://twitter.com/cbouzy/status/1581089757668352001>.

2. Attached as **Exhibit B** is a true and accurate copy of 4 related tweets posted by Bouzy on April 19, 2023, which are available at <https://twitter.com/cbouzy/status/1648662272410107904> (FAC ¶ 81, bullet 1), <https://twitter.com/cbouzy/status/1648662274360442880>, <https://twitter.com/cbouzy/status/1648662276168138753>, and

<https://twitter.com/cbouzy/status/1648662277984337921> (FAC ¶ 81, bullet 2).

3. Attached as **Exhibit C** is a true and accurate copy of 7 related tweets posted by Bouzy on April 21, 2023, which are available at

<https://twitter.com/cbouzy/status/1649393687124647936> (FAC ¶ 81, bullet 3),

<https://twitter.com/cbouzy/status/1649393688995323916>,

<https://twitter.com/cbouzy/status/1649393690303930371>,

<https://twitter.com/cbouzy/status/1649393691633627136>,

<https://twitter.com/cbouzy/status/1649393692950642688> (FAC ¶ 81, bullet 4),

<https://twitter.com/cbouzy/status/1649393694179483648>, and

<https://twitter.com/cbouzy/status/1649393701569921026>.

4. Attached as **Exhibit D** is a true and accurate copy of 2 related tweets posted by Bouzy on April 21, 2023, which are available at

<https://twitter.com/cbouzy/status/1649550393351839748> (FAC ¶ 81, bullet 5), and

<https://twitter.com/cbouzy/status/1649550409315262467>.

5. Attached as **Exhibit E** is a true and accurate copy of 4 related tweets posted by Bouzy on May 3, 2023, which are available at

<https://twitter.com/cbouzy/status/1653797324915716106>,

<https://twitter.com/cbouzy/status/1653797326987702274> (FAC ¶ 81, bullet 6),

<https://twitter.com/cbouzy/status/1653797329739161602>, and

<https://twitter.com/cbouzy/status/1653797332071096322>.

6. Attached as **Exhibit F** is a true and accurate copy of 8 related tweets posted by Bouzy on May 25, 2023, which are available at

<https://twitter.com/cbouzy/status/1661770198230130697> (FAC ¶ 83, top-right),

<https://twitter.com/cbouzy/status/1661770200222449666> (FAC ¶ 83, top-left),

<https://twitter.com/cbouzy/status/1661770209802289155>,

<https://twitter.com/cbouzy/status/1661770217989582867>,

<https://twitter.com/cbouzy/status/1661770226050924544>,

<https://twitter.com/cbouzy/status/1661773311972454415>,

<https://twitter.com/cbouzy/status/1661776914695036928>, and

<https://twitter.com/cbouzy/status/1661783058972803073>.

7. Attached as **Exhibit G** is a true and accurate copy of 3 related tweets posted by Bouzy on April 20, 2023, which are available at

<https://twitter.com/cbouzy/status/1649039881300058112>,

<https://twitter.com/cbouzy/status/1649039884135309312>, and

<https://twitter.com/cbouzy/status/1649039886056300554> (FAC ¶ 83, bottom).

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 8, 2023

/s/ William P. Reiley  
William P. Reiley

# Exhibit A



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Lists



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Post

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

Weeks ago, I said Nathaniel Broughty was a fraud, and this tweet is proof. A licensed NY lawyer and former Assistant District Attorney is knowingly tweeting falsehoods for likes and retweets. Meghan Markle, Lisa Page, and Pete Buttigieg never paid my company...

Nate The Cashier | Bot Killer  
@NatetheLawyer

**Confirmed**  
Bouzy was paid by Meghan Markle, Amber Heard's team, Lisa Page and Pete Buttigieg.

Guess we now know why talking bad about them makes you disruptive and Neo Nazi accounts are Normal.



MobyDobie @moby\_dobie · 31m

New article in The Information reveals that #BouzyTheClown was paid by #MeghanMarkle

@hunleyeric @NatetheLawyer @NiernanJoe

Its algorithm has been trained to give Twitter accounts a score between 0% and 100% based on how closely they resemble accounts that flagrantly break Twitter's rules, helping users understand which accounts are problematic and which are not. The higher a Twitter account's Bot Sentinel score, the more likely it is to participate in targeted harassment and toxic trolling.

theLawyer

9:09 PM · Oct 14, 2022



10



81



550



7



Post your reply

Reply



Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Oct 14, 2022 ...  
Amber Heard's legal team hired us in early 2020, and we haven't had contact with anyone from her legal team since then. We have never been in contact with Amber Heard or her PR team. But I am not surprised that a man who would "joke" about falsifying evidence would lie for clout.



4



25



265



Lenz the Gavel @Lenzel\_Lee · Oct 15, 2022 ...

He's not afraid of being disbarred? He had to pass professional responsibility and do a moral/ethical character exam for the state of NY, right?

I remember when becoming and being a lawyer was admirable, hard, and competitive 🏆



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## Relevant people

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

Follow

When I was 9, I started coding on a Mattel Aquarius computer. I developed several products in my 20s & 30s, and then in 2018, I launched Bot Sentinel.

## What's happening

NBA · Last night  
Warriors at Cavaliers



Politics · Trending  
Judge Engoron  
Trending with Kise, Letitia James

Entertainment · Trending  
#NashvilleManifesto  
Trending with Crowder, Audrey Hale

Sports · Trending  
Stephen Vogt  
1,222 posts

Politics · Trending  
Former President Donald Trump  
13.9K posts

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## URL

https://twitter.com/cbouzy/status/1581089754887569409

## Timestamp

Mon Nov 06 2023 11:40:46 GMT-0500 (Eastern Standard Time)

# Exhibit B



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Post

Franklin B. Smith  
@fbsmith2017

Post

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

Read the four questions and take the polls:

Q1: If someone raises \$45,000 and claims it is for FUTURE legal expenses but doesn't disclose that a significant portion of that \$45,000 would be used to pay a previous unpaid balance, do you think that is that fraud?



5,142 votes · Final results

8:18 AM · Apr 19, 2023 · 113.4K Views



30



56



159



2



Post your reply

Reply



Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 19



Q2: Do you think the person who raised the \$45,000 for FUTURE legal expenses should release all of the invoices from the law firm to show how much he was billed and when he was billed?



2,785 votes · Final results



4



11



50



14K



14K



Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 19



Q3: Should the person who raised \$45,000 for FUTURE legal expenses disclose how much is left from the \$45,000 he raised?



3,098 votes · Final results



3



13



65



22K



22K



Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 19



Q4: If it is discovered the person who raised the \$45,000 raised the money under false pretenses, should he be reported to the NY Bar and authorities?



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@cbouzy

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When I was 9, I started coding on a Mattel Aquarius computer. I developed several products in my 20s & 30s, and then in 2018, I launched Bot Sentinel.

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Grizzlies at Trail Blazers



Politics · Trending

Judge Engoron

Trending with Kise, Letitia James

Trending in United States

#NashvilleShooter

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Stephen Vogt

1,632 posts

Politics · Trending

Former President Donald Trump

14.1K posts

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## URL

https://twitter.com/cbouzy/status/1648662272410107904

## Timestamp

Mon Nov 06 2023 11:43:57 GMT-0500 (Eastern Standard Time)





Franklin B. Smith  
@fbsmith2017

...

No, don't disclose it 3.3%

I am not sure 3.2%

3,098 votes · Final results

3 13 65 22K

**Christopher Bouzy (spoutable.com/cbouzy) @cbouzy · Apr 19**

Q4: If it is discovered the person who raised the \$45,000 raised the money under false pretenses, should he be reported to the NY Bar and authorities?

**Yes, report him 95.4%**

No, it's not that serious 2.7%

I am not sure 1.9%

3,068 votes · Final results

10 12 70 22K

**Glitter Girl\*1111 🇺🇸 @KCDancer1111 · Apr 19**

My two Pennies....  
If a person asks /raises money to buy an apple and I donate so they can purchase that apple then they should be buying an apple.  
Not paying off the grapes they bought prior.  
Period.

1 1 63 2.8K

**Eileen Lesko @eileenlesko · Apr 19**

Who is the person and what is the fundraiser?

3 2 1.7K

**MEJ<sup>7</sup> @mej7516 · Apr 19**

If it was fraudulent & collected via internet it is a federal crime.

1 15 1.4K

**Alice in Reality ♠️❤️ @Alices\_Reality · Apr 19**

Kind of like taking in money to fight "voter fraud" and refurbishing a private jet? 🤔

1 59 1.9K

**Phred is on Spoutable @PhredWrites · Apr 19**

FRAUD (legal definition)  
n. the intentional use of deceit, a trick or some dishonest means to deprive another of his/her/its money, property or a legal right.

1 26 2.8K

**More replies**

**Rosie5109 @Rosie0550 · Apr 19**

have you shown receipts as to where the donations you received for spoutable??  
Considering it only cost \$89 AND you left API opened for days... did you report that or notify anyone??

2 6 332

**lamedia @renesmeeexum · Apr 19**

**URL**

<https://twitter.com/cbouzy/status/1648662272410107904>

**Timestamp**

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# Exhibit C

X

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Christopher Bouzy (spoutible.com/cbouzy)

@cbouzy

All grifters use the same playbook, and Nathaniel isn't any different. Nate didn't release the invoices showing how much he was billed, nor did he disclose how much money is remaining. Instead, he insults me and then asks for more money. This is starting to smell like fraud...

Nate The Lawyer

@NatetheLawyer

Thank you to everyone for letting me know that Christopher Bouzy is still defaming me this morning.

The team and I are not going to respond to any more allegations while we wait for the court to rule on the Motion to Dismiss.

It seems like each allegation that I prove false leads to more. It is clear that Christopher Bouzy is in panic mode and needs someone to shift attention from his failing company.

With that said we hope to win and move forward. If you want to support the effort here is the Gofundme to support the legal fight.

[gofund.me/7d04fad0](https://gofund.me/7d04fad0)

9:06 AM · Apr 20, 2023 · 47.6K Views

8:44 AM · Apr 21, 2023 · 33.7K Views

8

64

412

4

Post your reply

Reply

Christopher Bouzy (spoutible.com/cbouzy)

@cbouzy · Apr 21

Why does Nathaniel need more money? We are waiting on the judge to decide on the motion to dismiss. Nothing is happening. If what I am alleging is false, and he didn't have an unpaid legal bill, then he should have at least \$41,000 available for "future legal expenses..."

1

6

87

5.8K

Christopher Bouzy (spoutible.com/cbouzy)

@cbouzy · Apr 21

It's clear what happened here. Nathaniel initially raised a bit over \$30,000 the first time, and it wasn't enough for a demand letter, "investigation," motion to dismiss, and a response. So he ended up with an unpaid legal bill. Instead of being honest about what happened...

1

6

79

2.7K

Christopher Bouzy (spoutible.com/cbouzy)

@cbouzy · Apr 21

He mischaracterized the phone call between the lawyers and made it appear like we proposed a cash settlement offer. Then he immediately started fundraising again and explicitly stated it was for future legal expenses. He never disclosed to his donors he had an unpaid bill...

1

6

79

3K

Christopher Bouzy (spoutible.com/cbouzy)

@cbouzy · Apr 21

Anything besides releasing the invoices from the law firm and disclosing the remaining balance is noise. And the fact he is still fundraising without disclosing that information is disturbing.

Franklin B. Smith

@fbsmith2017

...

Relevant people

Christopher Bouzy (spoutible.com/cbouzy)

@cbouzy

When I was 9, I started coding on a Mattel Aquarius computer. I developed several products in my 20s & 30s, and then in 2018, I launched Bot Sentinel.

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Stephen Vogt

1,632 posts

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https://twitter.com/cbouzy/status/1649393687124647936

Timestamp

Mon Nov 06 2023 11:44:51 GMT-0500 (Eastern Standard Time)

Franklin B. Smith  
@fbsmith2017

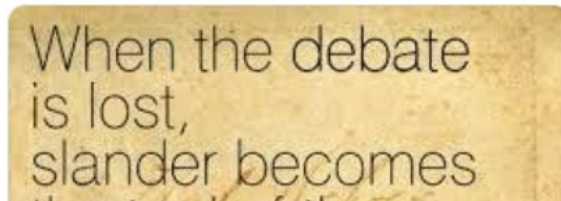
- ...the first time, and it wasn't enough for a demand letter, investigation, motion to dismiss, and a response. So he ended up with an unpaid legal bill. Instead of being honest about what happened...
- 1 6 79 2.7K
- Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 21** ...  
He mischaracterized the phone call between the lawyers and made it appear like we proposed a cash settlement offer. Then he immediately started fundraising again and explicitly stated it was for future legal expenses. He never disclosed to his donors he had an unpaid bill...
- 1 6 79 3K
- Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 21** ...  
Anything besides releasing the invoices from the law firm and disclosing the remaining balance is noise. And the fact he is still fundraising without disclosing that information is disturbing.
- We both know you lied, Nate. The question now is, is what you did considered fraud?..
- 1 10 80 3.2K
- Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 21** ...  
Stop with the childish insults and projections about panicking and failing, and just release the invoices and how much money is remaining. Prove I am lying, Nate. There is no legitimate reason not to share the information unless you know you are in legal jeopardy...
- 3 10 142 17K
- Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 21** ...  
Checkmate low-budget grifter.



5 5 157 17K

- Vince Waggoner @VinceWaggoner · Apr 21** ...  
This guy is your windmill isn't he?
- 1 3 695

- Valerie @fabylousfabyl · Apr 21** ...  
Nate is a total Loser. #HorribleHuman



#### URL

<https://twitter.com/cbouzy/status/1649393687124647936>


#### Timestamp

Mon Nov 06 2023 11:44:51 GMT-0500 (Eastern Standard Time)

# Exhibit D

←

Post



Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

...

You raised nearly \$80,000 and shared screenshots of wire transfers. But suddenly, sharing invoices and telling your donors about your previous unpaid legal bills is a problem? Nathaniel, you are a fraud. Release the invoices/balance info, and tell your donors the truth...



Nate The Lawyer  
@NatetheLawyer

...

Update:  
The defendant in my lawsuit wants me to release my legal invoices to him.





**"He would like to know how much money we have spent and how much money we have left to spend."**


No person in their right mind would give the defendant they are suing that information.

If you want to support the lawsuit here is the link to the gofundme:  
[gofund.me/7d04fad0](https://gofund.me/7d04fad0)

Remember all funds will be used for the lawsuit BROUGHTY v. BOUZY (2:22-cv-06458). Upon completion of the lawsuit, any and all unused funds will be donated to the Texas Children's Hospital.

7:07 PM · Apr 21, 2023 · 29.5K Views

 6  48  350  2 



Post your reply

Reply




Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · Apr 21

...



Notice Nate has not disputed he had a previously unpaid balance.

I don't care about how much money is remaining; I already know it's not enough. I just want people to know you lied and raised money off that lie.



←

Post

 2  12  128  21K  

**URL**

<https://twitter.com/cbouzy/status/1649550393351839748>

**Timestamp**

Mon Nov 06 2023 12:48:53 GMT-0500 (Eastern Standard Time)

# Exhibit E






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- Lists
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Post


**Post**


**Christopher Bouzy** (spoutible.com/cbouzy) @cbouzy


**Reminder:** Nathaniel Broughty raised over \$47,000 from his second fundraiser, claiming it was for future legal expenses. He did not disclose he had an unpaid legal bill, and most of the funds were used to pay the past-due bill. Nathaniel hasn't disputed any of this...

12:23 PM · May 3, 2023 · **38.5K** Views

 1
  40
  308
  1
 


**Who can reply?**  
 Accounts @cbouzy follows or mentioned can reply


**Christopher Bouzy** (spoutible.com/cbouzy) @cbouzy · May 3
 

 1
  7
  86
  4.5K
 





**Christopher Bouzy** (spoutible.com/cbouzy) @cbouzy · May 3
 

 1
  3
  94
  15K
 



**Christopher Bouzy** (spoutible.com/cbouzy) @cbouzy · May 3
 

 1
  6
  87
  15K
 



**Franklin B. Smith**  
 @fbsmith2017

...


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**Relevant people**


**Christopher Bouzy** (spoutible.com/cbouzy) @cbouzy
 

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When I was 9, I started coding on a Mattel Aquarius computer. I developed several products in my 20s & 30s, and then in 2018, I launched Bot Sentinel.

**What's happening**

NBA · Last night  
**Warriors at Cavaliers**


Trending in United States  
**#NashvilleManifesto**  
 Trending with [#NashvilleShooter](#)

Politics · Trending  
**#TrumpTrial**  
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Trending in United States  
**Dubai**  
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Home

Explore

Notifications

Messages

Lists

Bookmarks

Communities

Premium

Profile

More

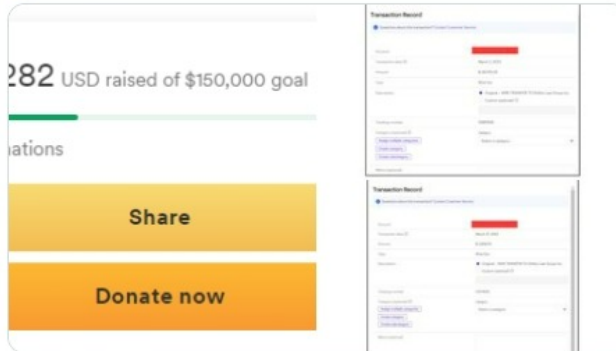
Post

Post

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

⚠️ Has Nathaniel Broughty (NateTheLawyer) explained where the \$4,586.96 from his second fundraiser went yet? He showed he sent \$41,360.04 to his lawyer but nothing since March.

💰 Raised: \$47,282  
 📄 GoFundMe fees: \$1,335  
 ⚖️ Legal fees: \$41,360.04  
 💸 Missing: \$4,586.96



12:24 PM · May 25, 2023 · 40.7K Views

💬 2    ↻ 31    ❤️ 181    📌 3    ↗



Who can reply?

Accounts @cbouzy follows or mentioned can reply



Christopher Bouzy (spoutible.com/cbouzy) @cbouzy · May 25

Note: Nathaniel Broughty deleted his first fundraiser after raising over \$32,000. Nathaniel raised approximately \$80,000 in total but hasn't been able to show a full accounting of how he spent the money.

[pages.donately.com/natethelawyer/...](https://pages.donately.com/natethelawyer/)


\$32,385.95    938

Franklin B. Smith  
@fbsmith2017

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## Relevant people

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

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When I was 9, I started coding on a Mattel Aquarius computer. I developed several products in my 20s & 30s, and then in 2018, I launched Bot Sentinel.

## What's happening

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Warriors at Cavaliers

Trending in United States  
**#NashvilleManifesto**  
 Trending with Crowder, Audrey Hale

Politics · Trending  
**Letitia James**  
 Trending with Judge Engoron, #TrumpTrial

Trending in United States  
**Dubai**  
 60.6K posts

Music · Trending  
**Lauryn Hill**  
 13.6K posts

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## URL

<https://twitter.com/cbouzy/status/1661770198230130697>

## Timestamp

Mon Nov 06 2023 12:55:51 GMT-0500 (Eastern Standard Time)

Franklin B. Smith  
@fbsmith2017

...



\$32,385.95  
Raised of \$10,000.00

938  
Supporters

100% Funded

CAMPAIGN DESCRIPTION

I am filing a lawsuit against a company named Bot Sentinel and its owner for defamation and other causes of action.



1



8



34



3.2K



Christopher Bouzy ([spoutible.com/cbouzy](https://spoutible.com/cbouzy)) @cbouzy · May 25

...

At some point, his donors will want answers when his meritless lawsuit is dismissed, and he begs for more money to amend his complaint or file an appeal. Remember, his second fundraiser was for FUTURE legal expenses. He will need to explain what happened to the money.



1



8



38



1.9K



Christopher Bouzy ([spoutible.com/cbouzy](https://spoutible.com/cbouzy)) @cbouzy · May 25

...

I would also like to remind his donors that they have fully funded this lawsuit, and Nathaniel Broughty has yet to share invoices with his donors to show precisely how much he has spent on legal fees. He claims it will put him at a strategic disadvantage if he shares that info.

URL

<https://twitter.com/cbouzy/status/1661770198230130697>

Timestamp

Mon Nov 06 2023 12:55:51 GMT-0500 (Eastern Standard Time)

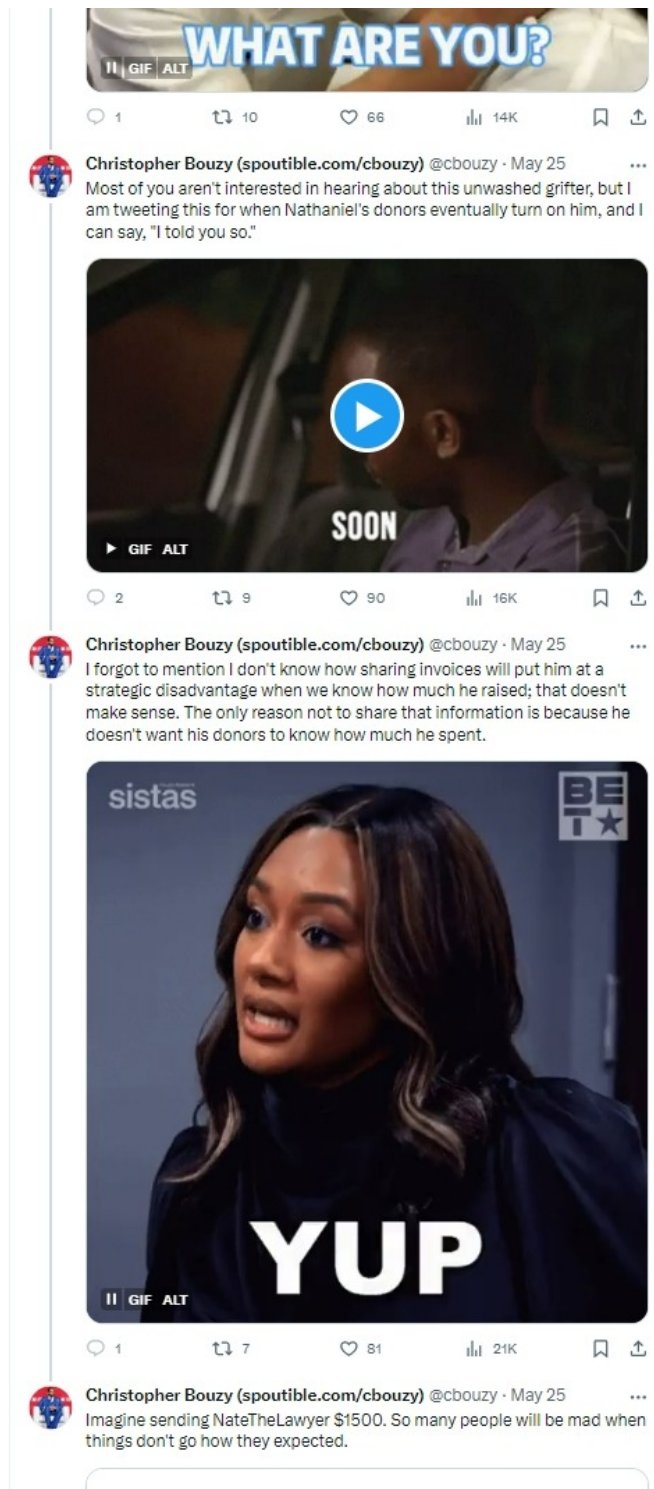


**URL**

<https://twitter.com/cbouzy/status/1661770198230130697>

**Timestamp**

Mon Nov 06 2023 12:55:51 GMT-0500 (Eastern Standard Time)

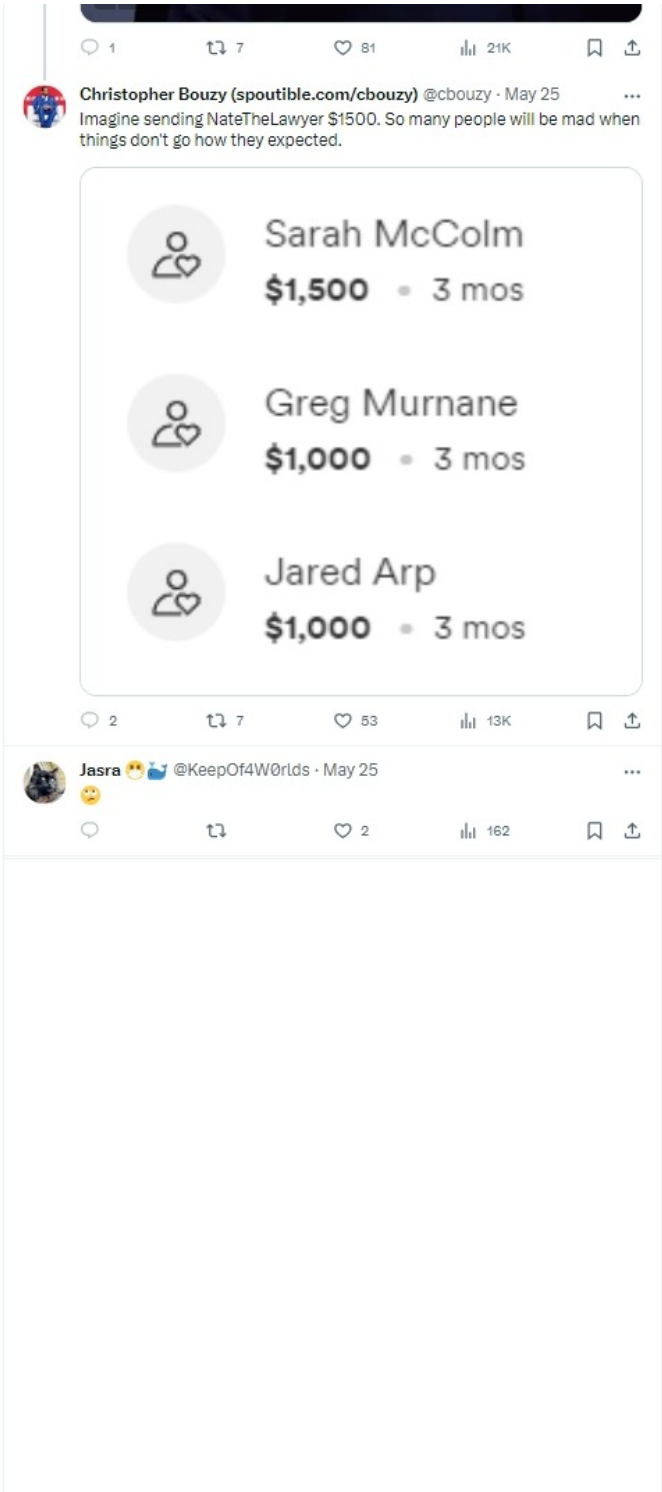


**URL**

<https://twitter.com/cbouzy/status/1661770198230130697>

**Timestamp**

Mon Nov 06 2023 12:55:51 GMT-0500 (Eastern Standard Time)



**URL**

<https://twitter.com/cbouzy/status/1661770198230130697>

**Timestamp**

Mon Nov 06 2023 12:55:51 GMT-0500 (Eastern Standard Time)

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Notifications

Messages

Lists

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Franklin B. Smith  
@fbsmith2017

Post

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

Some of you have been wondering why I have been recently pressing this Nathaniel Broughty issue, and here is why.

After weeks of insinuating my lawyers offered him a cash settlement and fundraising off that deception, he has finally admitted we never offered him cash...

Nate The Lawyer  
@nate\_thelawyer

Generally, I would not release this BUT Christopher Bouzy is openly accusing me of lying about his settlement offer and claiming I am defrauding you.

To prove I am not committing fraud and lying to you please see Christopher Bouzy's statements that there was never an offer.

THEN look at the proof.

It is clear he is desperate and losing it. All I can hope is that Christopher Bouzy stops lying.

your words are nothing. I'll show you that about a settlement offer and then you will never move forward on that. You then keep on saying for future legal expenses. I am not a lawyer. I see funds for a past due bill, that might be possible.

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## Relevant people

Christopher Bouzy (spoutible.com/cbouzy)  
@cbouzy

Follow

When I was 9, I started coding on a Mattel Aquarius computer. I developed several products in my 20s & 30s, and then in 2018, I launched Bot Sentinel.

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Trending in United States  
#NashvilleManifesto  
Trending with Crowder, Audrey Hale

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